

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 20-CV-954**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and VITAL
MANAGEMENT SERVICES, INC.,

Defendants.

**PLAINTIFF'S
NOTICE OF FILING SEALED
DOCUMENTS**

Pursuant to Section 8 of the Confidentiality Protective Order (ECF No. 177), Plaintiff Farhad Azima respectfully gives the Court and parties notice of filing the following documents under seal:

- Exhibit 1 – Select portions of Defendant Del Rosso deposition transcript that includes portions that Defendants have designated as confidential.
- Exhibit 2 – Documents produced by Defendants between 2018 and 2019 relating to Plaintiff Azima, including emails from Neil Gerrard to Defendant Del Rosso attaching drafts of witness statements for Stuart Page and Majdi Halabi regarding Plaintiff's hacked data, a "Farhad Azima Internet Data Access Chronology" describing information about Plaintiff's hacked data, correspondence regarding data reviewed by Northern Technologies, Inc. relating to Plaintiff, and correspondence attaching news articles about Plaintiff. Defendants have designated each of these documents as confidential.
- Exhibit 3 – Invoices from Vital Management Services to Ras Al Khaimah from March 2018 and December 2019. Defendants have designated each of these documents as confidential. Plaintiff has redacted the federal tax identification number, which is the only portion he believes to be properly designated as confidential.
- Exhibit 5 – Correspondence involving Dechert LLP partner Caroline Black in 2015, including correspondence with Bell Pottinger regarding articles about Plaintiff and correspondence from Gerrard to Stuart Page

and others regarding a report prepared by Page and Dechert's relationship with Page and Del Rosso. Dechert has designated each of these documents as confidential.

- Exhibit 6 – Correspondence from Gerrard to Dechert LLP partner James Croock and others regarding a meeting with Stuart Page in November 2016. Dechert has designated this document as confidential.

These exhibits are filed under seal in connection with Plaintiff's Memorandum in Support of Plaintiff's Motion to Show Cause and Response to the Motions of Defendants Nicholas Del Rosso and Vital Management Services, Inc. ("Defendants") and Dechert LLP. The grounds for this notice are set forth in the memorandum in support of the notice filed contemporaneously herewith.

Plaintiff sought consent from Defendants and Dechert to file these documents publicly with the limited redactions described above, so as not to burden the Court with additional motions to seal. Neither Defendants nor Dechert had agreed to allow the documents to be filed publicly at the time of the filing.

This, the 29th day of August, 2023.

WOMBLE BOND DICKINSON (US) LLP

/s/ Ripley Rand _____

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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 20-CV-954-WO-JLW**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and
VITAL MANAGEMENT
SERVICES, INC.,

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of this Notice to the following attorneys:

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This, the 29th day of August, 2023.

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